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October 27, 2008

Thomas G. Bousquet, Esq.  
Bousquet & Divine  
9225 Katy Freeway #103  
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*By Facsimile (713) 827-0096*

Re: *T-M Vacuum Products, Inc. v. TAISC, Inc., d/b/a GlobaLease Solutions, Inc.*; Case No. 07-4108 in the United States District Court for the Southern District of Texas: Plaintiff's Response to Defendant's Motion for Protective Order

Dear Tom:

Enclosed is our response to your motion for protection regarding post-judgment document requests. The response has also been served electronically.

I intend to go forward with Mr. Berry's deposition this Wednesday. It may be necessary to take his deposition again after the court rules on your motion, but I do not want to postpone the commencement of the deposition and review of documents you will produce. Naturally, my client reserves the right to seek an award of attorney's fees and costs for the additional deposition, as we feel the document objections are not substantially justified.

As I have indicated previously, the deposition will take less time if you will produce the requested document in advance. Let me know if and when they are available, otherwise I will see you both this Wednesday morning.

Sincerely,



H. Miles Cohn

cc Fred Stuffer  
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